



Clay Hollow Segment 2-4 Work Plan Considerations

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Gentlemen:

The following are notable items the agencies have discussed internally during review of the Segment 1 work plan for Clay Hollow. This is not meant to be a comprehensive list of outstanding issues, but be advised the agencies will be reviewing the pending work plan for sections 2-4 with the expectation that these items are addressed. It is hoped including these items in the next version of the work plan will reduce comments and compress the timeline for approving the document.

- Demonstrating containment has been re-established on Leach Pad 5 through engineering drawings that define capacity of the newly installed benches, storm water velocity and volume calculations, corrective action procedures that will be implemented following a failed internal inspection of the pad, etc. This level of detail was not provided in the work plan for segment 1.
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- The cleanup must define and address the source area. For example, if it has been determined that Leach Pad 5 is the source of the contaminated sediment, all contaminated material beyond the pad liner (containment) must be identified and disposed as part of cleanup activities. If a source other than or in addition to Pad 5 exists, it must also be removed as part of the cleanup and/or permanently contained.
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- Unless cleanup levels established for segment 1 are maintained throughout the cleanup area, present permanent design features that will be constructed to prevent the continued spread of higher concentrations downstream. For example, blocking culverts and installing silt fences are considered interim measures implemented to initiate the downstream cleanup, but are not considered permanent solutions to preventing the spread of future contaminants.

Beyond these items, the remainder of the work plan is anticipated to be similar to that of Segment 1. Let me know if there are questions.

Thank you.

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